

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

***THIS DOCUMENT RELATES TO
ALL CASES***

Case No. 3:16-md-2738-MAS-RLS

MDL Case No. 2738

**PLAINTIFFS' STEERING COMMITTEE'S MOTION TO SEAL
EXHIBITS FILED WITH THE OPPOSITION TO DEFENDANTS
JOHNSON & JOHNSON AND LLT MANAGEMENT, LLC'S MOTION TO
EXCLUDE THE OPINIONS OF DR. DANIEL CLARKE-PEARSON**

Pursuant to Rule 5(d) of the Federal Rules of Civil Procedure and Local Civil Rules 5.3(c) and 7.1, Plaintiffs, by and through Plaintiffs' Steering Committee ("PSC"), hereby move to file Exhibits 5, 7, 8, 9, 28, 29 and 30 to the Declaration of P. Leigh O'Dell, submitted in support of the PSC's Memorandum of Law in Response and Opposition to Defendants Johnson & Johnson and LLT Management, LLC's Motion to Exclude the Opinions of Dr. Daniel Clarke-Pearson (ECF No. 33126) under seal.

These documents reference personal medical histories, diagnoses, and treatment of Bellwether Plaintiffs or otherwise sensitive materials that are

confidential and not appropriate at this time for public access. Therefore, the PSC moves the Court for leave to submit 5, 7, 8, 9, 28, 29 and 30 to the Declaration of P. Leigh O'Dell under seal.

A Proposed Order is simultaneously submitted with this Motion.

Dated: August 28, 2024

Respectfully submitted,

/s/ Michelle A. Parfitt

Michelle A. Parfitt
ASHCRAFT & GEREL, LLP
1825 K Street, NW, Suite 700
Washington, DC 20006
Tel: 202-335-2600
mparfitt@ashcraftlaw.com

/s/ P. Leigh O'Dell

P. Leigh O'Dell
BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, P.C.
218 Commerce St.
Montgomery, AL 36104
Tel: 334-269-2343
leigh.odell@beasleyallen.com

Plaintiffs' Co-Lead Counsel

/s/ Christopher M. Placitella

Christopher M. Placitella
COHEN, PLACITELLA & ROTH,
P.C.
127 Maple Ave.
Red Bank, NJ 07701
Tel: 732-747-9003
clpacitella@cprlaw.com

Plaintiffs' Liaison Counsel

CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

Respectfully submitted,

/s/ P. Leigh O'Dell

P. Leigh O'Dell